

EXHIBIT C

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8 [Proposed] General Counsel for Debtor-in-Possession

9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA - FOR THE COUNTY OF LOS ANGELES**

11 In re:) Case No.: 2:13-bk-15130-SK
12 GGW BRANDS, LLC,)
13 Debtor) **DECLARATION OF JOSEPH FRANCIS**
14) **IN OPPOSITION TO MOTION FOR**
15) **ORDER DIRECTING THE APPOINTMENT**
16) **OF A CHAPTER 11 TRUSTEE**
17)
18) Date: April 10, 2013
19) Time: 10:30 a.m.
20) Place: Courtroom 1575
21) 255 E. Temple Street
22) Los Angeles, CA 90017
23)
24)
25)
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21 I, Joseph Francis, being first duly sworn, declare and allege as follows:

22 1. I am an individual who resides in Los Angeles, California. I was named as a
23 defendant in the cases entitled Wynn Las Vegas, LLC v. Francis and Wynn Las Vegas, LLC v.
24 GGW Direct, LLC that were filed in the District Court of Nevada ("State Court Cases"). I started
25 the Girls Gone Wild brand many years ago but no longer have any official role with respect to the
26 brand. I have personal knowledge of the facts set forth herein and if called as a witness I could, and
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1 would, so competently testify hereto.

2 2. Wynn Las Vegas, LLC ("Wynn"), a very wealthy Las Vegas business concern, and its
3 owner Stephen Wynn have a vendetta against me. The Debtor in the above-captioned case has been
4 caught up in that vendetta.

5 3. I am not, and have never been, an owner or manager of the GGW Entities (as defined
6 in the Opposition).

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8 4. In 1998, I started the Girls Gone Wild brand by the formation of Mantra Films, Inc.,
9 ("Mantra") of which I was an officer and a shareholder. Mantra, through my direction made films of
10 young women on spring break and the phrase "Girls Gone Wild" became part of the cultural
11 landscape of America in the first decade of the 21st century.

12
13 5. In 2007 and 2008, I was incarcerated for about 11 months in Reno, Nevada on federal
14 tax charges. During my period of incarceration, I had no involvement in the business. After I was
15 released, I discovered that the business had been looted by the other officers of Mantra. This left the
16 Girls Gone Wild brand struggling for survival.

17
18 6. Then, in late 2009, only hours after the criminal tax charges against me had been
19 settled, the IRS took virtually all of my assets, and also took operating cash needed by Mantra. This
20 left the company unable to operate and it effectively ceased to exist in 2010.

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1 7. In the past, Debtor has paid certain expenses related to my lifestyle because my image
2 helps sell Debtor's products and services. Because of my past association with the Girls Gone Wild
3 brand, I have provided informal consultation services to the GGW Entities.

4 Executed at Chatsworth, California on March 28, 2013.

5 I declare under penalty of perjury that the foregoing is true and correct under the
6 laws of the United States of America and the State of California.
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9 
10 Joseph Francis